

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

**FOLLOW-UP INTERROGATORIES OF THE AMERICAN POSTAL WORKERS  
UNION, AFL-CIO  
TO USPS WITNESS CHERYL MARTIN  
(APWU/USPS-T6-12-20)  
(March 2, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following follow-up interrogatories to United States Postal Service witness Cheryl Martin (USPS-T-6). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T6-12 For the following questions please refer to the worksheet that accompanies your response to APWU/USPS T-6-1.

- a) The final PIR for Manasota to Tampa records no PVS mileage even though the AMP proposed no change in Tampa PVS and PVS service continues. Please confirm that the final PIR results in an overestimation of miles reduced associated with this AMP. If you cannot confirm, please detail when and how the PVS reductions were achieved.
- b) Please confirm that the PIR summary for Manasota to Tampa states that PVS savings are “irrelevant to the AMP implementation” and that “[e]ach of the PVS changes and the savings are attributable to streamlining operations and not a part of the AMP savings.” If you cannot confirm, please detail when and how the PVS reductions were achieved.
- c) Please confirm that based on the AMP summary, 78% of the HCR savings that appear in this PIR resulted from “routes that were eliminated not due to this AMP.” If you cannot confirm, please detail when and how the HCR reductions were achieved.
- d) Please provide any corrected PIR.
- e) Please provide any corrected numbers in your worksheet.

APWU/USPS-T6-13

- a) The first PIR for Dulles to No. Virginia (Merrifield) records no PVS mileage even though the AMP proposed no change in No. Virginia (Merrifield) PVS mileage and PVS service continues. Please confirm that the first PIR results in an overestimation of miles reduced with this AMP. If you cannot confirm, please detail when and how the PVS reductions were achieved.
- b) Please provide any corrected PIR.
- c) Please provide any corrected numbers in your worksheet.

APWU/USPS-T6-14

- a) The final PIR for Detroit to Michigan Metroplex in the listing of HCR routes and the final PIR Mileage column for the final 15 lines rows contain mileage numbers not associated with the listed HCR. Please confirm that these numbers are wrong. If confirmed, please provide the correct mileage. If not confirmed, please explain.
- b) Please provide the correct mileage numbers for those routes, a corrected version of the PIR and the documentation for the number that was used in your calculations.
- c) Please confirm that the summary text of the Detroit to Michigan Metroplex AMP states “the approved Detroit AMP projected an annual transportation cost of \$846,407. The initiatives put in place nationwide and the overall consolidation of some routes in both Detroit and Michigan Metroplex show a PIR savings of \$13,299,655. This number is misleading however when you look at the figures that actually apply to the Detroit originating AMP. The losing site added

312,234.3 HCR miles and reduced 42,145.2 HCR miles as a result of the AMP for a net change of 270,089.1 additional HCR miles. Changes to PVS were unrelated to the AMP. The remaining changes were due to simultaneous initiatives to reduce transportation costs.”

- d) Please provide any corrected PIR.
- e) Please provide any corrected numbers in your worksheet.

#### APWU/USPS-T6-15

- a) The final PIR for Wilkes-Barre to Scranton/Lehigh Valley PIR does not record any PVS miles in the PIR columns for either Scranton or Lehigh Valley. Please confirm that this results in an overestimation of the miles reduced by the AMP. If not confirmed, please explain.
- b) The original AMP states that there will be no change in the PVS service, please confirm that “no change” is the actual result or provide the corrected numbers.
- c) Please confirm that the calculations on the HCR contracts in the NP12 version of the PIR show only changes from proposed to actual rather than from prior to AMP to PIR because the prior to AMP column is redacted.
- d) Such redactions do not occur in the other PIRs in NP12. Is there a reason for the redaction in this particular PIR?
- e) Please confirm that if the comparison was made between the PIR levels and the pre-AMP levels that the result would be approximately a third the size of the number shown on your worksheet.
- f) Please provide any corrected PIR.
- g) Please provide any corrected numbers in your worksheet.

#### APWU/USPS-T6-16

- a) Please confirm that in the Charlottesville to Richmond PIR, that there is an error in the HCR calculations that causes you to overstate the reduction in miles by over 850,000 miles because the PIR time period numbers were not filled into the worksheet for Richmond (gaining) facility.
- b) Please confirm that the cost numbers in the PIR for the Richmond HCR contracts also do not appear to be correct and therefore the savings are overstated.
- c) Please provide any corrected PIR.
- d) Please provide any corrected numbers in your worksheet.

## APWU/USPS-T6-17

- a) Please provide the calculations for the positive 725,543 change in transportation mileage for the first PIR for Dallas, TX to North Texas. Please explain why the number is not 821,023.  $[(2,670,545+1,580,334+98,648)-(2,160,514+1,329,420+38,570)]$
- b) Please provide an explanation for the large negative cost adjustment on the Dallas, TX PIR column that has no associated mileage.
- c) Please provide any corrected PIR.
- d) Please provide any corrected numbers in your worksheet.

## APWU/USPS-T6-18

- a) Please confirm that the Flint to Metroplex originating mail information came from the Final PIR rather than the 1<sup>st</sup> PIR.
- b) The first PIR for Flint to Metroplex originating mail indicates that the “vast majority of the [transportation] savings was due to the unprecedented reduction in mail volume over the last two years.” Does this indicate that most of these savings were not a result of the consolidation but rather a normal reconfiguration of transportation routes? If so, please provide the numbers associated with the AMP.
- c) Please provide any corrected PIR.
- d) Please provide any corrected numbers in your worksheet.

APWU/USPS-T6-19 The summary of transportation changes in the Hickory to Greensboro final PIR include a discussion of two added routes from Hickory to act as HUBs. These routes are not included in the detailed HCR calculations in the PIR.

- a) Are these not included in the PIR because they are not directly applicable to the consolidation?
- b) Would these routes be typical of the type of hubbing operations that your testimony indicates would be used in the new configuration of facilities?

## APWU/USPS-T6-20

- a) Please confirm that the worksheet that accompanied APWU/USPS-T6-1(after the correction of all errors) contains ALL transportation changes noted between the pre-AMP and PIR time periods and not just those that resulted from the AMP.
- b) Since the PIRs seem to be able to distinguish between the transportation changes that are the result of the consolidation and the transportation changes that are the result of other changes to the transportation system, is it possible to distinguish between the two in your corrected response?

- c) Please confirm that transportation routes for a mail processing facility are scheduled to be re-evaluated on a regular basis and do not require a consolidation or an AMP study to make those changes.